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11 *Attorneys for Hiddencrest/Parkhurst  
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12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 1597 ASHFIELD VALLEY TRUST, a Nevada Trust;) CASE NO. 2:14-cv-2123-JCM-GWF  
15 DAVID TOTH and SIRWAN TOTH, Trustees,)  
16 Plaintiffs, ) **STIPULATION TO EXTEND  
17 vs. ) BRIEFING ON  
18 FEDERAL NATIONAL MORTGAGE ) COUNTERMOTION FOR  
19 ASSOCIATION SYSTEM, a Delaware Association; ) SUMMARY JUDGMENT (ECF  
20 VENTA FINANCIAL GROUP, INC., a Nevada ) **NO. 96]**  
21 Corporation; OSCAR MORENO, an Individual; )  
22 DOES, 1 through 25 inclusive; and ROE )  
23 CORPORATIONS, I through X, inclusive, )  
24 Defendants.)  
25 \_\_\_\_\_)  
26 FEDERAL NATIONAL MORTGAGE )  
27 ASSOCIATION SYSTEM, )  
28 Counterclaimant, )  
vs. )  
1597 ASHFIELD VALLEY TRUST, a Nevada Trust;) )  
DAVID TOTH and SIRWAN TOTH, Trustees;) )  
HIDDENCREST/PARKHURST COMMUNITY )  
ASSOCIATION, a Nevada non-Profit Corporation;) )  
and ABSOLUTE COLLECTION SERVICES, LLC, a) )  
Nevada Limited-Liability Company, )  
Counterdefendants.)  
\_\_\_\_\_)**

1                   **STIPULATION TO EXTEND BRIEFING ON COUNTERMOTION FOR SUMMARY**  
2                   **JUDGMENT (ECF NO. 96)**

3                   **(First Request)**

4                   Pursuant to Local Rules 6-1 and 7-1, the parties, by and through their attorneys of record,  
5 submit the following stipulation for the Court's review and approval.

6                   1.         On October 16, 2015, this Court issued an order setting November 16, 2015 as the  
7 deadline to file further motions for summary judgment. ECF No. 84.

8                   2.         On December 10, 2015, Oscar Moreno file an opposition to a motion for  
9 summary judgment filed by several defendants. ECF No. 96.

10                  3.         Moreno's opposition contained a countermotion for summary judgment. ECF No.  
11 96.

12                  4.         The parties believe that Moreno's countermotion for summary judgment complies  
13 with the Court's October 16, 2015 Order, but to the extent this Court considers Moreno's  
14 countermotion for summary judgment as untimely under the October 16, 2015 order, the parties  
15 agree that this Court should grant Moreno leave to file the countermotion for summary judgment  
16 (ECF No. 96) because the parties desire to have all remaining claims and issues resolved by  
17 motion so necessary appeals may proceed.

18                  5.         The parties also agree that they should be afforded the same timeline set forth in  
19 Local Rule 7-2 to file responses and replies to Moreno's countermotion for summary judgment.

20                  6.         Therefore, any responses to Moreno's countermotion for summary judgment  
21 (ECF No. 96) must be filed and served by January 8, 2016.

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1       ///

2              7. Any replies to responses to Moreno's countermotion for summary judgment (ECF  
3 No. 96) must be filed and served in accordance with Local Rule 7-2(e) or January 25, 2015.

4              DATED: January 4, 2016.

5              FENNEMORE CRAIG

6              /s/ John D. Tennert

7              Leslie Bryan Hart, Esq. (SBN 4932)  
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Finance Agency*

10             DATED: January 4, 2016.

11             ALDRIDGE PITE, LLP

12             /s/ Laurel I. Handley

13             Laurel I. Handley, Esq. (SBN 9576)  
Krista J. Nielson, Esq. (SBN 10698)  
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16             DATED: January 4, 2016.

17             BLACK & LOBELLO

18             /s/ Maximiliano D. Couvillier, III, Esq.

19             Maximiliano D. Couvillier, III, Esq.  
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4              DATED: January 4, 2016.

5              GORDON & REES LLP

6              /s/ Ashlie L. Surur

7              Robert S. Larsen, Esq. (SBN 7785)  
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10             DATED: January 4, 2016.

11             CHARLES L. GEISENDORF, LTD.

12             /s/ Charles L. Geisendorf

13             Charles L. Geisendorf, Esq. (SBN 6985)  
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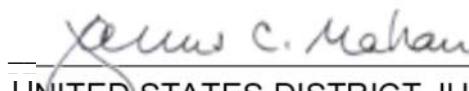
16             DATED: January 4, 2016.

17             KANG & ASSOCIATES

18             /s/ Erica D. Loyd, Esq.

19             Patrick W. Kang, Esq. (SBN 10381)  
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23             IT IS SO ORDERED:

24               
\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

25             DATED: January 6, 2016